

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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March 3, 2022

VIA ECF

Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Lawrence Ray, 20 Cr. 110 (LJL)

Dear Judge Liman:

We write regarding the Court's proposed voir dire and preliminary instructions which the Court distributed to the parties on Monday.

With respect to the initial summary of the case, the defense objects to portions of the language on pages 6-8 as insufficiently neutral. Rather than providing an impartial overview of the charges, it includes arguments that the government will make to the jury about its theory of the case. It also uses the word "victim," which the Court has previously indicated should be used sparingly in the trial, and only in the government's addresses to the jury. For the reasons explained in the defense motions in limine, we request that the word "victim" be changed to complainant or people or another neutral word. The defense respectfully requests that the Court delete the following portions, which improperly present the government's theory of the case:

- (1) Page 7: Delete the paragraph that begins with "The Government" and ends with "their trust."
- (2) Page 7: Delete the clause beginning with "in order, among other things, to extract purported confessions."
- (3) Page 8: Delete the portion of the first paragraph from "For example," to "more 'repairs.'" The last sentence of this paragraph could then be edited to read "The Government alleges that on one occasion, the defendant assaulted a woman in furtherance of the scheme."

Additionally, we respectfully request that page 8 make clear that the allegations with respect to sex trafficking only relate to one person.

Finally, as we requested in our letter dated February 28, 2022, Dkt. No. 398, in light of the Court's *in limine* rulings, we request that the Court include the follow inquiry at the top of page 20:

This case involves allegations of "grooming" behavior. Are you familiar with the term "grooming"? Have you, a family member or close friend, ever been sexually

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groomed? Does the nature of that alleged conduct make it difficult for any of you to render a fair verdict?

Thank you for your time and consideration of this matter.

Respectfully submitted,

/s/

Marne L. Lenox, Esq.
Peggy Cross-Goldenberg, Esq.
Allegra Glashausser, Esq.
Neil Kelly, Esq.
Counsel for Lawrence Ray

cc: AUSA Danielle R. Sassoon, Esq.
AUSA Lindsey Keenan, Esq.
AUSA Mollie Bracewell, Esq.